

RICHARD A. MARSHACK
rmarshack@marshackhays.com
MARSHACK HAYS WOOD LLP
870 Roosevelt
Irvine, California 92620
Telephone: (949) 333-7777
Facsimile: (949) 333-7778

Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re

THE LITIGATION PRACTICE GROUP P.C,

Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

TRUSTEE'S NOTICE OF INTENT TO
ABANDON ESTATE'S INTEREST, IF
ANY, IN CERTAIN ASSETS LOCATED AT
500 EAST BROWARD BOULEVARD,
FORT LAUDERDALE, FLORIDA

[Pursuant to 11 U.S.C. § 554(a) and LBR
6007-1]

TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,
THE OFFICE OF THE UNITED STATES TRUSTEE, ALL CREDITORS, AND OTHER
INTERESTED PARTIES:

PLEASE TAKE NOTICE that Richard A. Marshack, the duly appointed, qualified and
acting Chapter 11 Trustee ("Trustee") of the Bankruptcy Estate ("Estate") of The Litigation Practice
Group P.C. ("Debtor"), intends to abandon the Estate's interest, if any, in property of the Estate as
detailed below, pursuant to 11 U.S.C. § 554(a) and Local Bankruptcy Rule ("LBR") 6007-1, without
further Court order:

ASSETS TO BE ABANDONED

Prior to bankruptcy, on or about September 20, 2022, Debtor entered into an Office Lease
("Lease") with FTL 500 CORP ("Landlord") with regard to the office building located at 500 East
Broward Blvd., Fort Lauderdale, FL 33394 ("Premises"). On January 3, 2024, as Dk. No. 808,
Trustee filed a stipulation for return of possession of the Premises after rejection of the Lease

1 (“Stipulation”). On January 10, 2024, as Dk. No. 825, the Court entered an order approving the
2 Stipulation.

3 As described in the Stipulation, there remains personal property left at the Premises including
4 printers, furniture and other office items (“Personal Property”). Trustee has determined the Personal
5 Property value is burdensome and of inconsequential value to the Estate and not worth trying to
6 reclaim, store and sell. Considering the liquidating value, and the costs to move, store, and sell this
7 type of personal property, any benefit to the Estate would be inconsequential. Accordingly, Trustee
8 believes it is in the best interest of the Estate to abandon the Estate’s interest, if any, in the remaining
9 Personal Property. Thus, pursuant to LBR 6007-1(a), Trustee seeks to abandon any interest in the
10 Personal Property. Photographs of the Personal Property are attached hereto.

11 PLEASE TAKE FURTHER NOTICE that any response and request for hearing as to the
12 proposed abandonment must be in the form as required by Local Bankruptcy Rules 9013-1(f) and (o)
13 and filed with the Clerk of the above-entitled Court. The deadline for any response and request for
14 hearing is 14 days after the date of service of this Notice, plus an additional 3 days unless this Notice
15 was served by personal delivery or posting as described in Fed. R. Civ. P. 5(b)(2)(A)-(B). A copy of
16 any response or request for hearing must be served on Richard A. Marshack at the address indicated
17 above and served on the Office of the United States Trustee, 411 W. Fourth Street, Suite 7160, Santa
18 Ana, CA 92701.

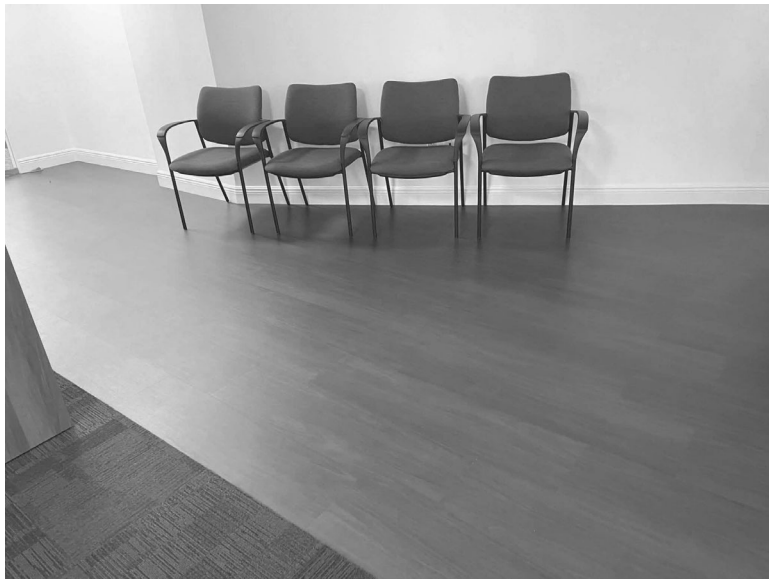
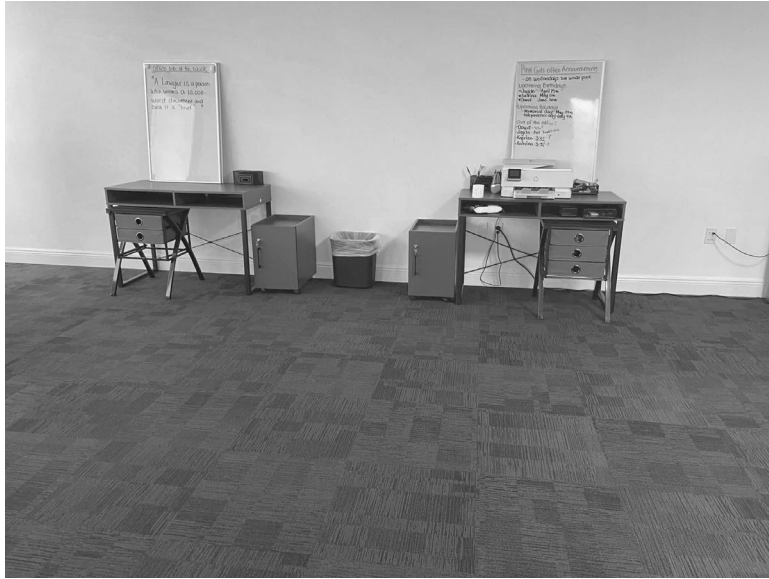
19 Failure to timely respond may be deemed as acceptance of the proposed abandonment. *See*
20 Local Bankruptcy Rules 6007-1 and 9013-1(h). As such, if no such objection or request for hearing
21 is served and filed within the seventeen (17) day period, the Trustee will proceed with the
22 abandonment on or after the eighteenth (18th) day after service of this Notice. Plainly put, if no
23 timely objection and request for hearing is filed and served, the Personal Property shall be deemed
24 abandoned without further order of the Court.

25 DATED: February 7, 2024

Respectfully Submitted,

26 By: /s/ Richard A. Marshack
27 RICHARD A. MARSHACK
28 Chapter 11 Trustee







PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **NOTICE OF INTENT TO ABANDON PERSONAL PROPERTY AT 500 E BROWARD, FT LAUDERDALE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **February 7, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **February 7, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR – MAIL REDIRECTED TO TRUSTEE

THE LITIGATION PRACTICE GROUP P.C.
17542 17TH ST
SUITE 100
TUSTIN, CA 92780-1984

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **February 7, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA EMAIL:

ATTORNEY FOR INTERESTED PARTY / LANDLORD
FTL 500 CORP
LARRY I. GLICK, ESQ.
SHUTTS & BOWEN LLP
LGlick@shutts.com

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

February 7, 2024
Date

Pamela Kraus
Printed Name

/s/ Pamela Kraus
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:

ATTORNEY FOR CREDITOR AFFIRMA, LLC and CREDITOR OXFORD KNOX, LLC	Eric Bensamochan	eric@eblawfirm.us, G63723@notify.cincompass.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Peter W Bowie	peter.bowie@dinsmore.com, caron.burke@dinsmore.com
ATTORNEY FOR CREDITOR SDCO TUSTIN EXECUTIVE CENTER, INC	Ronald K Brown	ron@rkbrownlaw.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Christopher Celentino	christopher.celentino@dinsmore.com, caron.burke@dinsmore.com
INTERESTED PARTY COURTESY NEF	Shawn M Christianson	cmcintire@buchalter.com, schristianson@buchalter.com
INTERESTED PARTY COURTESY NEF	Randall Baldwin Clark	rbc@randallbclark.com
ATTORNEY FOR DEFENDANT LISA COHEN and DEFENDANT ROSA BIANCA LOLI:	Leslie A Cohen	leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;clare@lesliecohenlaw.com
INTERESTED PARTY COURTESY NEF	Aaron E. DE Leest	adeleest@DanningGill.com, danninggill@gmail.com;adeleest@ecf.inforuptcy.com
INTERESTED PARTY COURTESY NEF	Anthony Paul Diehl	anthony@apdlaw.net, Diehl.AnthonyB112492@notify.bestcase.com,ecf@apdlaw.net
ATTORNEY FOR INTERESTED PARTY NATIONAL ASSOCIATION OF CONSUMER BANKRUPTCY ATTORNEYS and INTERESTED PARTY NATIONAL CONSUMER BANKRUPTCY RIGHTS CENTER	Jenny L Doling	jd@jdl.law, dolingjr92080@notify.bestcase.com;15994@notices.nextchapterbk.com;jdoling@jubileeibk.net
ATTORNEY FOR CREDITOR CAROLYN BEECH	Daniel A Edelman	dedelman@edcombs.com, courtelc@edcombs.com
CREDITOR	Meredith Fahn	fahn@sbcglobal.net
ATTORNEY FOR CREDITOR VALIDATION PARTNERS LLC	William P Fennell	william.fennell@fennelllaw.com, luralene.schultz@fennelllaw.com;wpf@ecf.courtdrive.com;hala.hammi@fennelllaw.com;naomi.cwalinski@fennelllaw.com;samantha.larimer@fennelllaw.com
ATTORNEY FOR DEFENDANT CLEAR VISION LLC dba LIBERTY1 FINANCIAL	Marc C Forsythe	mcforsythe@goeforlaw.com, mforsythe@goeforlaw.com;dcyrankowski@goeforlaw.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Jeremy Freedman	jeremy.freedman@dinsmore.com, nicollette.murphy@dinsmore.com
ATTORNEY FOR CREDITOR HERRET CREDIT	Eric Gassman	erg@gassmanlawgroup.com, gassman.ericb112993@notify.bestcase.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Christopher Ghio	christopher.ghio@dinsmore.com, nicollette.murphy@dinsmore.com;angelica.urena@dinsmore.com;deamira.romo@dinsmore.com

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

ATTORNEY FOR CREDITOR AMY GINSBURG; CREDITOR KENTON COBB; and CREDITOR SHANNON BELLFIELD	Amy Lynn Ginsburg	efilings@ginsburglawgroup.com
ATTORNEY FOR DEFENDANT STRIPE, INC	Eric D Goldberg	eric.goldberg@dlapiper.com , eric-goldberg-1103@ecf.pacerpro.com
ATTORNEY FOR CREDITOR AFFIRMA, LLC; CREDITOR ANAHEIM ARENA MANAGEMENT, LLC; CREDITOR ANAHEIM DUCKS HOCKEY CLUB, LLC; and CREDITOR OXFORD KNOX, LLC	Jeffrey I Golden	jgolden@go2.law , kadele@ecf.courtdrive.com ; cbmeeker@gmail.com ; lbracken@wgllp.com ; dfitzgerald@go2.law ; golden.jeffreyi.b117954@notify.bestcase.com
ATTORNEY FOR CREDITOR DEBT VALIDATION FUND II, LLC; CREDITOR MC DVI FUND 1, LLC; and CREDITOR MC DVI FUND 2, LLC	Richard H Golubow	rgolubow@wghlawyers.com , jmartinez@wghlawyers.com ; svillegas@wghlawyers.com
ATTORNEY FOR CREDITOR UNITED PARTNERSHIPS, LLC	David M Goodrich	dgoodrich@go2.law , kadele@go2.law ; dfitzgerald@go2.law ; wggllp@ecf.courtdrive.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	D Edward Hays	ehays@marshackhays.com , ehays@ecf.courtdrive.com ; alinares@ecf.courtdrive.com ; cmendoza@marshackhays.com ; cmendoza@ecf.courtdrive.com
ATTORNEY FOR CREDITOR CITY CAPITAL NY	Alan Craig Hochheiser	ahochheiser@mauricewutscher.com , arodriguez@mauricewutscher.com
ATTORNEY FOR CREDITOR DEBT VALIDATION FUND II, LLC; CREDITOR MC DVI FUND 1, LLC; and CREDITOR MC DVI FUND 2, LLC	Garrick A Hollander	ghollander@wghlawyers.com , jmartinez@wghlawyers.com ; svillegas@wghlawyers.com
ATTORNEY FOR CREDITOR SHARP ELECTRONICS CORPORATION	Brian L Holman	b.holman@musickpeeler.com
INTERESTED PARTY COURTESY NEF	Richard L. Hyde	richard@amintalati.com
ATTORNEY FOR INTERESTED PARTY MERCHANTS CREDIT CORPORATION	Peter L Isola	pisola@hinshawlaw.com
ATTORNEY FOR CREDITOR, PLAINTIFF, and COUNTER-DEFENDANT OHP-CDR, LP and PLAINTIFF and COUNTER-DEFENDANT PURCHASECO 80, LLC	Razmig Izakelian	razmigizakelian@quinnemanuel.com
ATTORNEY FOR FIDELITY NATIONAL INFORMATION SERVICES, INC. DBA FIS	Sweeney Kelly	kelly@ksqklaw.com
ATTORNEY FOR DEBTOR THE LITIGATION PRACTICE GROUP P.C.	Joon M Khang	joon@khanglaw.com
ATTORNEY FOR INTERESTED PARTY AD HOC CONSUMER CLAIMANTS COMMITTEE	Ira David Kharasch	ikharasch@pszjlaw.com
ATTORNEY FOR DEFENDANT GALLANT LAW GROUP	Meredith King	mking@fsl.law , ssanchez@fsl.law ; jwilson@fsl.law
ATTORNEY FOR COMMITTEE OF UNSECURED CREDITORS	Nicholas A Koffroth	nkoffroth@foxrothschild.com , khoang@foxrothschild.com

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ATTORNEY FOR DEFENDANT MARICH BEIN, LLC	David S Kupetz	David.Kupetz@lockelord.com, mylene.ruiz@lockelord.com
INTERESTED PARTY COURTESY NEF	Christopher J Langley	chris@slclawoffice.com, omar@slclawoffice.com;langleycr75251@notify.bestcase.com;ecf123@casedriver.com;john@slclawoffice.com
ATTORNEY DEFENDANT OPTIMUMBANK HOLDINGS, INC	Matthew A Lesnick	matt@lesnickprince.com, matt@ecf.inruptcy.com;jmack@lesnickprince.com
ATTORNEY FOR DEFENDANT CONSUMER LEGAL GROUP, P.C.; DEFENDANT LGS HOLDCO, LLC; INTERESTED PARTY CONSUMER LEGAL GROUP, P.C.; and INTERESTED PARTY LIBERTY ACQUISITIONS GROUP INC	Daniel A Lev	daniel.lev@gmlaw.com, cheryl.caldwell@gmlaw.com;dlev@ecf.courtdrive.com
ATTORNEY FOR INTERESTED PARTY REVOLV3, INC.	Brittney Leyva	bleyva@mayerbrown.com, 2396393420@filings.docketbird.com;KAWhite@mayerbrown.com;ladoCKET@mayerbrown.com
INTERESTED PARTY COURTESY NEF ADVERSARY PROCEEDING #: 8:23-AP-01148-SC	Marc A Lieberman	marc.lieberman@flpllp.com, safa.saleem@flpllp.com,addy@flpllp.com
ATTORNEY FOR CREDITOR PHILLIP A GREENBLATT, PLLC	Michael D Lieberman	mlieberman@lipsonneilson.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Yosina M Lissebeck	Yosina.Lissebeck@Dinsmore.com, caron.burke@dinsmore.com
ATTORNEY FOR CREDITOR FUNDURA CAPITAL GROUP	Mitchell B Ludwig	mb1@kpclegal.com, kad@kpclegal.com
INTERESTED PARTY AND ATTORNEY	Daniel S March	marchlawoffice@gmail.com, marchdr94019@notify.bestcase.com
ATTORNEY FOR CREDITOR and DEFENDANT GREYSON LAW CENTER PC, CREDITOR and DEFENDANT HAN TRINH; and CREDITOR and DEFENDANT PHUONG (JAYDE) TRINH	Kathleen P March	kmarch@bkylawfirm.com, kmarch3@sbcglobal.net,kmarch@sbcglobal.net
ATTORNEY FOR CREDITOR DAVID ORR	Mark J Markus	bklawr@bklaw.com, markjmarkus@gmail.com;markus.markj.r112926@notify.bestcase.com
CHAPTER 11 TRUSTEE	Richard A Marshack (TR)	pkraus@marshackhays.com, rmarshack@iq7technology.com;ecf.alert+Marshack@titlexi.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Laila Masud	lmasud@marshackhays.com, lmasud@ecf.courtdrive.com;lbuchanan@marshackhays.com;alinares@ecf.courtdrive.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Sarah S. Mattingly	sarah.mattingly@dinsmore.com
INTERESTED PARTY COURTESY NEF	William McCormick	Bill.McCormick@ag.tn.gov
ATTORNEY FOR US TRUSTEE	Kenneth Miskin	Kenneth.M.Miskin@usdoj.gov

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INTERESTED PARTY COURTESY NEF	Byron Z Moldo	bmoldo@ecjlaw.com, amatsuoka@ecjlaw.com,dperez@ecjlaw.com
ATTORNEY FOR CREDITOR ADP, INC	Glenn D. Moses	gmoses@venable.com, cascavone@venable.com;ipmalcolm@venable.com;jadel gado@venable.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Jamie D Mottola	Jamie.Mottola@dinsmore.com, jhanawalt@ecf.inforuptcy.com
INTERESTED PARTY COURTESY NEF	Alan I Nahmias	anahmias@mbn.law, jdale@mbn.law
INTERESTED PARTY COURTESY NEF	Victoria Newmark	vnewmark@pszjlaw.com
ATTORNEY FOR US TRUSTEE	Queenie K Ng	queenie.k.ng@usdoj.gov
CREDITOR	Israel Orozco	israel@iolawcorp.com
ATTORNEY FOR COMMITTEE OF UNSECURED CREDITORS	Keith C Owens	kowens@foxrothschild.com, khoang@foxrothschild.com
ATTORNEY FOR DEFENDANT OPTIMUMBANK HOLDINGS, INC.	Lisa Patel	patel@lesnickprince.com, jmack@lesnickprince.com;jnavarro@lesnickprince.com
ATTORNEY FOR CREDITOR WELLS MARBLE AND HURST, PLLC	Michael R Pinkston	rpinkston@seyfarth.com, jmcdermott@seyfarth.com,sfocalendar@seyfarth.com,53 14522420@filings.docketbird.com,bankruptcydocket@sey farth.com
ATTORNEY FOR DEFENDANT SCOTT JAMES EADIE	Douglas A Plazak	dplazak@rhlaw.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Tyler Powell	tyler.powell@dinsmore.com, jennifer.pitcock@dinsmore.com;rosetta.mitchell@dinsmor e.com
ATTORNEY FOR DEFENDANT TOUZI CAPITAL, LLC and DEFENDANT ENG TAING	Daniel H Reiss	dhr@lnbyg.com, dhr@ecf.inforuptcy.com
ATTORNEY FOR DEFENDANT CONSUMER LEGAL GROUP, PC	Ronald N Richards	ron@ronaldrichards.com, 7206828420@filings.docketbird.com
ATTORNEY FOR CREDITOR WELLS MARBLE AND HURST, PLLC	Kevin Alan Rogers	krogers@wellsmar.com
ATTORNEY FOR CREDITOR MARI AGAPE	Gregory M Salvato	gsalvato@salvatoboufadel.com, calendar@salvatolawoffices.com;jboufadel@salvatoboufa del.com;gsalvato@ecf.inforuptcy.com
ATTORNEY FOR CREDITOR AZZURE CAPITAL LLC and CREDITOR HI BAR CAPITAL LLC	Olivia Scott	olivia.scott3@bclplaw.com
ATTORNEY FOR CHAPTER 11 TRUSTEE RICHARD A MARSHACK (TR)	Jonathan Serrano	jonathan.serrano@dinsmore.com
ATTORNEY FOR RANDALL BALDWIN CLARK ATTORNEY AT LAW PLLC	Maureen J Shanahan	Mstotaro@aol.com
ATTORNEY FOR CREDITORS UNITED PARTNERSHIPS, LLC and MNS FUNDING LLC	Paul R Shankman	PShankman@fortislaw.com, info@fortislaw.com

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ATTORNEY FOR INTERESTED PARTY MORNING LAW GROUP, PC	Zev Shechtman	zs@DanningGill.com, danninggill@gmail.com; zshechtman@ecf.inforuptcy.com
ATTORNEY FOR US TRUSTEE	Leslie Skorheim	leslie.skorheim@usdoj.gov
ATTORNEY FOR CREDITOR PIONEER FUNDING GROUP, LLC	Adam D Stein-Sapir	info@pflc.com
ATTORNEY FOR DEFENDANT BANKUNITED, N.A.	Howard Steinberg	steinbergh@gtlaw.com, pearsallt@gtlaw.com; NEF-BK@gtlaw.com; howard-steinberg-6096@ecf.pacerpro.com
ATTORNEY FOR CREDITOR ALTERYX, INC.	Andrew Still	astill@swlaw.com, kcollins@swlaw.com
ATTORNEY FOR CREDITOR RANDALL BALDWIN CLARK ATTORNEY AT LAW PLLC and INTERESTED PARTY RANDALL BALDWIN CLARK	Michael R Totaro	Ocbkatty@aol.com
US TRUSTEE	United States Trustee (SA)	ustregion16.sa.ecf@usdoj.gov
ATTORNEY FOR WITNESS BRADFORD LEE 8:23-ap-01046-SC	William J Wall	wwall@wall-law.com
ATTORNEY FOR CREDITOR and DEFENDANT AZZURE CAPITAL LLC and CREDITOR HI BAR CAPITAL LLC	Sharon Z. Weiss	sharon.weiss@bclplaw.com, raul.morales@bclplaw.com, REC_KM_ECF_SMO@bclplaw.com
ATTORNEY FOR CREDITOR DEBT RELIEF GROUP, LLC	Johnny White	JWhite@wrslawyers.com, jlee@wrslawyers.com

2. SERVED BY UNITED STATES MAIL: continued:

20 LARGEST CREDITOR

ANTHEM BLUE CROSS
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY APPOINTMENT
OR LAW TO RECEIVE SERVICE OF
PROCESS
PO BOX 511300
LOS ANGELES, CA 90051-7855

20 LARGEST CREDITOR

CALIFORNIA FRANCHISE TAX BOARD
PO BOX 942857
SACRAMENTO, CA 94257-0001

20 LARGEST CREDITOR

AZEVEDO SOLUTIONS GROUPS, INC
ATTN: OFFICER, A MANAGING OR GENERAL
AGENT, OR TO ANY OTHER AGENT
AUTHORIZED BY APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
420 ADOBE CANYON RD
KENWOOD, CA 95452-9048

RTD 05/30/23 UTF

20 LARGEST CREDITOR

COLLABORATION ADVISORS
ATTN: OFFICER, A MANAGING OR GENERAL
AGENT, OR TO ANY OTHER AGENT
AUTHORIZED BY APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
400 DORLA COURT
ZEPHYR COVE, NV 89448

RTD 02/05/24 UTF

20 LARGEST CREDITOR

BUSINESS CENTERS OF AMERICA
ATTN: OFFICER, A MANAGING OR GENERAL
AGENT, OR TO ANY OTHER AGENT
AUTHORIZED BY APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
1100 SIR FRANCIS DRAKE BLVD, SUITE 1
KENTFIELD, CA 94904-1476

20 LARGEST CREDITOR

CREDIT REPORTING SERVICE INC
ATTN: OFFICER, A MANAGING OR GENERAL
AGENT, OR TO ANY OTHER AGENT
AUTHORIZED BY APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
548 MARKET ST, SUITE 72907
SAN FRANCISCO, CA 94104-5401

20 LARGEST CREDITOR

DEBT PAY PRO
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY APPOINTMENT
OR LAW TO RECEIVE SERVICE OF
PROCESS
1900 E GOLF ROAD, SUITE 550
SCHAUMBURG, IL 60173-5870

20 LARGEST CREDITOR

EXECUTIVE CENTER LLC
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY APPOINTMENT
OR LAW TO RECEIVE SERVICE OF
PROCESS
5960 SOUTH JONES BLVD
LAS VEGAS, NV 89118-2610

RTD 12/05/23 UTF**20 LARGEST CREDITOR**

JP MORGAN CHASE
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY APPOINTMENT
OR LAW TO RECEIVE SERVICE OF
PROCESS
3 PARK PLAZA, STE 900
IRVINE, CA 92614-5208

20 LARGEST CREDITOR

NETSUITE-ORACLE
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY APPOINTMENT
OR LAW TO RECEIVE SERVICE OF
PROCESS
2300 ORACLE WAY
AUSTIN, TX 78741-1400

20 LARGEST CREDITOR

TUSTIN EXECUTIVE CENTER
ATTN: OFFICER, A MANAGING OR
GENERAL AGENT, OR TO ANY OTHER
AGENT AUTHORIZED BY APPOINTMENT
OR LAW TO RECEIVE SERVICE OF
PROCESS
1630 S SUNKIST STEET, STE A
ANAHEIM, CA 92806-5816

20 LARGEST CREDITOR

DEBT VALIDATION FUND II, LLC
ATTN: OFFICER, A MANAGING OR GENERAL
AGENT, OR TO ANY OTHER AGENT
AUTHORIZED BY APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
5075 LOWER VALLEY ROAD
ATGLEN, PA 19310-1774

20 LARGEST CREDITOR / POC ADDRESS

EXELA ENTERPRISE SOLUTIONS
ATTN: OFFICER, A MANAGING OR GENERAL
AGENT, OR TO ANY OTHER AGENT
AUTHORIZED BY APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
2701 E. GRAUWYLER ROAD
IRVING, TX 75061-3414

RTD 01/26/24 UTF**20 LARGEST CREDITOR**

LEXISNEXUS
ATTN: OFFICER, A MANAGING OR GENERAL
AGENT, OR TO ANY OTHER AGENT
AUTHORIZED BY APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
15500 B ROCKFIELD BLVD
IRVINE, CA 92618-2722

20 LARGEST CREDITOR

SHARP BUSINESS SYSTEMS
ATTN: OFFICER, A MANAGING OR GENERAL
AGENT, OR TO ANY OTHER AGENT
AUTHORIZED BY APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
8670 ARGENT ST
SANTEE, CA 92071-4172

RTD 06/05/23 UTF**20 LARGEST CREDITOR**

VALIDATION PARTNERS LLC
ATTN: OFFICER, A MANAGING OR GENERAL
AGENT, OR TO ANY OTHER AGENT
AUTHORIZED BY APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
1300 SAWGRASS PKWY, STE 110
SUNRISE, FL 33323

20 LARGEST CREDITOR

DOCUMENT FULFILLMENT SERVICES
ATTN: OFFICER, A MANAGING OR GENERAL
AGENT, OR TO ANY OTHER AGENT
AUTHORIZED BY APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
2930 RAMONA AVE #100
SACRAMENTO, CA 95826-3838

20 LARGEST CREDITOR / POC ADDRESS

FIRST LEGAL NETWORK, LLC
ATTN: OFFICER, A MANAGING OR GENERAL
AGENT, OR TO ANY OTHER AGENT
AUTHORIZED BY APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
PO BOX 743451
LOS ANGELES, CA 90074-3451

RTD 10/03/23 UTF**20 LARGEST CREDITOR**

MARICH BEIN LLC
ATTN: OFFICER, A MANAGING OR GENERAL
AGENT, OR TO ANY OTHER AGENT
AUTHORIZED BY APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
99 WALL STREET, STE 2669
NEW YORK, NY 10005-4301

RTD 10/16/23 UTF**20 LARGEST CREDITOR**

TASKUS HOLDINGS, INC.
ATTN: OFFICER, A MANAGING OR GENERAL
AGENT, OR TO ANY OTHER AGENT
AUTHORIZED BY APPOINTMENT OR LAW TO
RECEIVE SERVICE OF PROCESS
1650 INDEPENDENCE DR
NEW BRAUNFELS, TX 78132-3959

4861-5645-9683